

**CVP Power Initiative Implementation Plan**

Last Revised: 4/13/2021

Milestone	Action	Timeline	Target Completion	Status	Completion Date	Lead Office	Lead POC
<b>I. Reporting and Implementation</b>							
(I).1.a. - Provide a report of implementation to the Commissioner and Deputy Commissioners.						CVO	Melavic
	Develop a schedule with reporting milestones within 60 days of memo.	Within 60 days of memo	8/23/2019	Reclamation provided a coordinated action plan, complete with milestones, tasks and target completion dates for each directive on August 23. All information can be found here <a href="https://www.usbr.gov/mp/hydro.html">https://www.usbr.gov/mp/hydro.html</a> .	8/23/2019		
(I).1.b. - Provide an implementation status report to the Commissioner and Deputy Commissioners.						CVO	Melavic
	Provide an implementation status report of the action plan within 120 days of memo.	120 days of memo	10/23/2019	This revised plan as of October 18, 2019 is the 120-day status report.	10/18/2019		
	Provide a status report every 6 months.	every 6 months	4/20/2020	This revised plan as of May, 2020 and presented to the next customer forum (CCC), scheduled on June 2, 2020.	5/18/2020		
	Provide a status report every 6 months.	every 6 months	10/16/2020	This revised plan as of October, 2020 and presented to the next customer forum (CCC).	10/16/2020		
	Provide a status report every 6 months.	every 6 months	4/15/2021	<b>This is the revised plan as of April, 2021 and will be presented to the next customer forum (CCC)</b>	<b>4/15/2021</b>		
	Provide a status report every 6 months.	every 6 months	10/12/2021				
	Provide a status report every 6 months.	every 6 months	4/8/2022				
<b>II. Implementation - Cost Stability - Predictability and Transparency</b>							
(II).1.a. - Work with customers, WAPA and project proponent for Sites/North-of-Delta Off-Stream Storage (NODOS) Project on hydropower purpose analysis.						MP-700	Ryan Davis Vince Barbara
	Discuss analysis of benefits, costs, and financial impacts associated with the draft feasibility report's inclusion of a hydropower purpose to the proposed Sites/NODOS project with power customers at Power Customer Coordination Committee (CCC) meeting.		1/15/2019	Discussion Initiated in January 2019 customer meeting and ongoing per customer request to receive updates. It has been decided that hydropower generation is no longer being used or considered as a benefit for NODOS and thus no longer in the benefit calculation for Reclamation purposes.	3/13/2019		
	Draft Lt-Gen hydropower purpose analysis for Sites/NODOS project discussion with power preference customers.		2/11/2019	This Item was discussed with Power customers on 2/11/2020 at the CCC Meeting and with WAPA/Sites Administrator. Sites/NODOS is behind schedule due to manning issues. Sites is currently pursuing 2x paths with USBR as exchange customer or investor. Results in FR are now out of date due to sponsor changing many facilities/configurations. Recent efforts have removed hydropower generation as a claimed benefit from the NODOS project. As a result, no further hydropower modeling has been reviewed. The Authority, under its new alternative, is producing new hydropower modeling, independently of Reclamation and will make this modeling available December 2020; however, this modeling is unlikely to impact any benefit analysis as hydropower generation is no longer being used in the benefit calculation for Reclamation purposes.	2/11/2020		
	Submit administrative Final Feasibility Report to Commissioner's Office.		5/28/2020	The NODOS Feasibility Study is currently at OMB (9/18/2020) despite the Sites Authority reviewing different alternatives. USBR expects a determination of feasibility by the Secretary around November 2020. The feasibility report will go forward using the 2017 draft EIS/EIR that went out for public comment. The final EIS/EIR is to be completed by Spring 2022.	9/2/2020		
	Submit administrative Final Environmental Impact Statement to Commissioner's Office.		5/1/2022	The NODOS project was determined technically and financially feasible by the Secretary in December 2020. Hydropower generation is limited to two 40MW generating facilities. A publicly available detailed project description is listed on Sitesproject.org. A supplemental draft EIS/EIR will go out for public review August/September 2021. The final EIS/EIR is to be completed by summer 2022.			
	Participate in regular calls and discussions with Joint Power Authority to develop operations plan proposal.		Ongoing	Participating in Reservoir Committee and Executive Committee meetings.	Ongoing		
	Work with WAPA, customers and project proponents to finalize operations plan after determination of feasibility.		Sometime in 2022	LT-GEN and NODOS-Power models are currently being finalized by Jacobs Inc. and are expected by the end of March 2021. A draft term sheet describing proposed operations will be available by August 2021. WAPA Interconnection request will likely begin in 2022 as the project's operations plan and electrical requirements are further refined.			

		<b>(II).1.b. - Communicate any modifications to the benefits analysis in the NODOS Feasibility Report to power customers and appropriate stakeholders.</b>						MP-700	Ryan-Davis Vince Barbara
		Draft Lt-Gen benefits analysis for Sites/NODOS project for discussion with power preference customers.		2/11/2019	This Item was discussed with Power customers on 2/11/2020 at the CCC Meeting and with WAPA/Sites Administrator. Sites/NODOS is behind schedule due to manning issues. Sites is currently pursuing 2x paths with USBR as exchange customer or investor. Results in FR are now out of date due to sponsor changing many facilities/configurations. Recent efforts have removed hydropower generation as a claimed benefit from the NODOS project. As a result, no further hydropower modeling has been reviewed. The Authority, under its new alternative, is producing new hydropower modeling, independently of Reclamation and will make this modeling available December 2020; however, this modeling is unlikely to impact any benefit analysis as hydropower generation is no longer being used in the benefit calculation for Reclamation purposes.		2/11/2020		
		Submit administrative Final Feasibility Report to Commissioner's Office.		5/28/2020	The NODOS Feasibility Study is currently at OMB (9/18/2020) despite the Sites Authority reviewing different alternatives. USBR expects a determination of feasibility by the Secretary around November 2020. The feasibility report will go forward using the 2017 draft EIS/EIR that went out for public comment. The final EIS/EIR is to be completed by Spring 2022.		9/2/2020		
		Submit administrative Final Environmental Impact Statement to Commissioner's Office.		5/1/2022	The NODOS project was determined technically and financially feasible by the Secretary in December 2020. Hydropower generation is limited to two 40MW generating facilities. A publicly available detailed project description is listed on Sitesproject.org.-A supplemental draft EIS/EIR will go out for public review August/September 2021. The final EIS/EIR is to be completed by summer 2022.				
		Participate in regular calls and discussions with Joint Power Authority to develop operations plan proposal.		Ongoing	Participating in Reservoir Committee and Executive Committee meetings.		Ongoing		
		Work with WAPA, customers and project proponents to finalize operations plan after determination of feasibility.		TBD 2022	Schedule will be created after determination of Feasibility; Principles of Operation and basic guidelines include no harm to CVP Operations. LT-GEN and NODOS-Power models are currently being finalized by Jacobs Inc. and are expected by the end of March 2021. A draft term sheet describing proposed operations will be available by August 2021. WAPA Interconnection request will likely begin in 2022 as the project's operations plan and electrical requirements are further refined.				
		<b>(II).1.c. - Work with non-federal cost share partners, preference power customers, WAPA and stakeholders for Shasta Raise hydropower purpose analysis.</b>						MPCO	Welsh
		Provide Shasta Dam Raise updates at WAPA CCC meeting to ensure benefits, costs, and financial impacts associated with the draft Feasibility Report's inclusion of a hydropower purpose to the proposed project are analyzed, evaluated, and considered as the project moved forward.		8/22/2019	Complete.		8/22/2019		
		Lt-Gen corrections for power benefits due/to-be-completed.		TBD 2021	Lt-Gen and PLEXOS models have been evaluated by Reclamation. Lt-Gen model may be overpredicting generation and therefore planning division proposed a regression approach to address the bias. They are currently migrating to a greater focus on Lt-Gen for power modeling, instead of PLEXOS. Lt-Gen is being utilized to provide the power benefits due to unforeseen restrictions in the Plexos model.		ongoing	CGB 700	James Lu
		Contract to be awarded to provide additional PLEXOS runs to improve hydropower benefits analysis.		11/1/2020	Contract awarded. Complete.		8/19/2019		
		Complete revised benefits analysis.		4/1/2021	Benefits analysis will be provided at the power customer meeting following completion. Currently reviewing the modelling results of the revised benefits analysis. No new updates as of 3/19/2021				
		<b>(II).1.d. - Work with preference power customers and WAPA as appropriate on other feasibility studies.</b>						MP-700	Vince Barbara
		Discuss as a part of Reclamation's "Power Update" at all Power Customer CCC meetings to ensure the benefits, costs, and financial impacts associated with the inclusion of a hydropower purpose for proposed projects are analyzed, evaluated, and considered as projects move forward.	Every power meeting	Ongoing	As reported at the power update provided at the October 10, 2019 CCC meeting, a Reclamation team has actively been analyzing the models LT Gen and Plexos to assess the level of accuracy appropriate for feasibility studies. As of April, 2021, this is still ongoing. Updates are provided to power customers at power meetings		Ongoing	MPCO	Welsh
		<b>(II).1.d.1. - If feasibility is appropriately determined and Congressional authorization provided for a project - work with power customers, WAPA, project proponents, water contractors, and stakeholders to develop detailed operations plan.</b>							

		Modify appropriate internal directives to include outreach for stakeholders and power marketing agencies. Determine if additional outreach is required before feasibility is determined and add to appropriate directives and standards (if not already included).		7/31/2020	Following release of Appraisal Study D&S (CMP 09-01) and Planning Policy (CMP P09), Reclamation will begin updates to CMP 09-02 in 2019. CMP 09-02 was revised on December 12, 2019. As D&S are updated, BOR will provide updates to CVP Power customers as relevant.	Complete 12/12/2019	84-55000	
		Reclamation's Planning Office (MP-700) will begin coordination and development of detailed operations plan if and when feasibility is appropriately determined and Congressional authorization is provided for a project.	As needed basis.	Ongoing	Work will occur if/when feasibility is determined for any proposed project.	Ongoing	MP-700	Vince Barbara
<b>(II). 1.e. - Develop a Standard Operating Procedure (SOP) to document methodology and procedures for construction cost recovery.</b>								
		Meet with CVP Financial Affairs Committee (FAC) to determine items for SOP.		7/19/2019	Reclamation met with the CVP FAC and determined the SOP will document what Reclamation will do to ensure repayment is accomplished by 2030.	7/19/2019		
		Develop draft SOP within 60 days of meeting with FAC.		9/17/2019	An SOP was drafted and sent to FAC customers and WAPA for CVP Power customers for review. Customers provided feedback and BOR made necessary changes. As of 10/13/2020, The SOP is out for a second review.	9/18/2020		
		Share draft SOP at next FAC meeting.		9/20/2019	Initial draft SOP was shared 9/18/2020. Revised SOP has been sent to FAC and WAPA customers.	9/18/2020		
		Share draft SOP at WAPA CCC Customer Meeting.		10/10/2019	Reclamation will share the final SOP for Construction Cost Recovery with Power customers at the Customer Meeting immediately following the finalization of the SOP. Power customers have already received the most updated draft SOP. <b>The final SOP is complete and will be shared with Power customers at the next customer meeting.</b>	6/9/2020		
<b>(II).1.f. - Develop aid-to-irrigation document for Water Infrastructure Improvement for the Nation (WIIN) Act projects.</b>								
		Develop document describing handling of aid-to-irrigation for WIIN Act construction prepayment and new construction projects funded under WIIN authorities within 60 days of memo.	Within 60 days of memo.	8/28/2019	Reclamation provided a presentation and consulted with water and power stakeholders on TRMR #122, which was then finalized August 2019. The document can be found here: <a href="https://www.usbr.gov/recman/temporary_releases/pectrmr-122.pdf">https://www.usbr.gov/recman/temporary_releases/pectrmr-122.pdf</a>	8/28/2019		84-55000 Bill Taylor
<b>(II).1.g. - Share the SOP documenting the methodology for treatment of non-permanent revenue.</b>								
		Share draft SOP with customers at customer CCC meeting.		10/10/2019	Two draft SOP's have been prepared. They are being reviewed internally and shared with Reclamation FAC customers prior to sharing with WAPA for their comments. Still in Internal review process. Two Draft SOPs were shared with FAC members and WAPA on 5/26/2020. Changes and comments were received and documented.	5/26/2020		
		Discuss two finalized SOPs with power customers at CCC meeting.		10/10/2019	<b>Non-permanent revenue SOP is complete and will be shared with power customers at the next customer meeting.</b>	4/2/2021		
		Finalize SOP, which identifies (a) what this revenue represents (definition of this water), (b) the justification for the accounting process, and (c) description of the rate-setting schedules.	Review annually.	11/1/2019	<b>Non-permanent revenue SOP is complete and will be shared with power customers at the next customer meeting.</b>	4/2/2021		
		Review the guidelines annually.		11/1/2020	Reclamation can review Guidelines annually as needed.	Ongoing		
<b>(II).1.h. - Work with WAPA to maintain 10-year forecast of capital improvements. Review with customers at Technical Committee Meetings.</b>								
		Complete 10-year forecast of capital improvements for CVP power infrastructure.		8/6/2019	Complete and ongoing revisions tied to each MMPPC meeting.	8/6/2019		
		Reclamation provided a presentation and an opportunity to review the 10-year forecast with CVP customers at Technical Committee Meetings.	Every Technical Committee	8/6/2019	This was provided at the MMPPC and Technical Committee Meeting and finalized August 2019. - Complete and ongoing.	8/6/2019		
		Update 10-year forecast annually.	Annually.	8/1/2020	For latest updates, please contact Steve Melavic at smelavic@usbr.gov. The forecast is being revised and shared with power customers more frequently than annually (MMPPC, Technical Committee and CCC meetings). This has been included as part of the agenda for each meeting and is updated regularly. Updates are shared at each meeting as part of the agenda.	Complete/Ongoing		
<b>(II).1.i. - Work with WAPA, power customers, and stakeholders to develop a variance percentage threshold between budgeted and actual expenditures.</b>								
		Reclamation will seek customer and stakeholder input on appropriate variance percentage threshold.	Ongoing.	10/31/2019	Reclamation submitted a memorandum to WAPA for approval, which proposes to establish a 10% variance threshold for budget and actual expenditures on multi-purposes O&M Construction Costs. Explanation of any exceedance beyond 10% will be provided by both agencies. The memorandum was submitted on 9/23/2020.	9/23/2020		MP-3000 Lubas Williams
		Determine appropriate variance percentage threshold between budgeted and actual expenditures for transparency of multipurpose O&M and construction costs.	Ongoing.	1/13/2020	Reclamation prepared a memorandum for WAPA for approval, which proposes to establish a 10% variance threshold for budget and actual expenditures on multi-purposes O&M Construction Costs. Explanation of any exceedance beyond 10% will be provided by both agencies. <b>The memorandum was drafted on 9/23/2020 and will be sent to WAPA for approval by the end of April.</b>	4/15/2021		
		Document and share variance percentage commitment with power customers.		6/1/2020	<b>This information will be shared at the CCC meeting immediately following finalization.</b>	4/15/2021		
<b>(II).1.j. - Implement benchmarking of CVP hydropower data and share annually.</b>								
		Prepare preliminary report outlining results of cost and operational data for CVP generators.		10/31/2019	Reclamation continues to develop this report and will share when completed. Suggested metrics for the data shared with customers via email. CVO Office shared Benchmarking data from 2016-2018 with Power customers in February 2020 at the TC Meeting	2/6/2020		CVO Sanchez
		Share results with Reclamation management and power customers.		10/31/2019	Results were shared at customer TC meeting in February 2020 following completion. This is an annual requirement and will continue each year after benchmarking results are finalized.	2/6/2020		
		Prepare and share report with Reclamation management and power customers annually.	Annually.	10/31/2020	Results will be shared at TC meetings annually.	Ongoing		





		Engage power in the planning process and provide regular updates to power customers.	Ongoing	5/31/19 - Ongoing	The State of California continues to proceed with planning efforts for the Delta Conveyance Project. The state released the Notice of Preparation (NOP) for the new project. Reclamation submitted a comment letter that requested a clear delineation between the existing biological monitoring requirements and the monitoring requirements resulting from changes from system wide programs due to the addition of the Delta Conveyance Project; an initial plan that describes how DWR would operate the Delta Conveyance Project and comply with Federal Endangered Species Act requirements related to operations; and a detailed analysis of the effects of the Delta Conveyance Project on the CVP. <b>From Reclamation's perspective, there is not anything new to report. Reclamation has not re-engaged with the State of California on Delta Conveyance Project and we are not sure what direction this Administration will want to go regarding the project and our participation.</b>	Ongoing	CVO	
		<b>(V).1.b. - Develop Mid-Pacific webpage on Reclamation's website to host initiative updates.</b>					PAO	Plain
		Develop webpage that contains the (a) coordinated action plan, (b) biannual updates, (c ) accomplishments, and (d) reference materials for the CVP Power Initiative.		6/24/2019	The webpage and all associated information can be found here: <a href="https://www.usbr.gov/mp/hydro.html">https://www.usbr.gov/mp/hydro.html</a> - Complete.	6/24/2019		